

K&L GATES

MEMO ENDORSED

March 10, 2021

Granted. The Clerk of Court is respectfully directed to terminate the motion. Doc. 113. So ordered.



Edgardo Ramos, U.S.D.J

Dated: 3/11/2021

New York, New York

Joanna A Diakos

joanna.diakoskordalis@klgates.com

T +1 212 536 4807

F +1 212 536 3901

By ECF

The Honorable Edgardo Ramos
 United States District Court for the Southern
 District of New York
 40 Foley Square
 New York, NY 10007

Re: Bodum Holding AG et al. v. Starbucks Corporation, Case No. 1:19-cv-04280-ER

Dear Judge Ramos:

We represent Defendant Starbucks Corporation (“Starbucks” or “Defendant”) in the referenced action.

In connection with our concurrent letter request for a pre-motion conference regarding the scope of discovery as it relates to Count III of Bodum’s Third Amended Complaint, we write to respectfully request permission to file redacted copies of Defendant Starbucks Corporation’s Responses and Objections to Plaintiffs’ Third Set of Document Requests and Starbucks Corporation’s Responses and Objections to Plaintiffs’ Third Set of Interrogatories (the “Responses”) on the public docket and to file unredacted copies of these Responses under seal. The Responses are relevant to the discovery dispute that has arisen between the parties and are attached as exhibits to the pre-motion letter. In connection with that filing, and consistent with past practice in this action, Starbucks seeks to redact only those portions of the Responses that quote from the Confidential Settlement Agreement and Release (the “2008 Settlement Agreement”). As Your Honor is aware, the 2008 Settlement Agreement contains a strict confidentiality provision. The Court has previously allowed Starbucks (and Bodum) to partially redact portions of their pleadings and motion papers and to file unredacted copies under seal. *See, e.g.*, ECF Nos. 29, 38, 46, 67, 72, 79 and 97. As with the prior requests, good cause exists for granting the instant request.

Accordingly, pursuant to Paragraph 17 of the Stipulated Confidentiality Agreement and Protective Order entered on December 4, 2019, Starbucks respectfully requests permission to file redacted versions of its Responses on the public docket and unredacted versions under seal. Defendant's proposed redactions are highlighted in the unredacted Responses.

Respectfully submitted,

/s/ Joanna A. Diakos

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